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Cc: []

From: CN=David Powers/OU=R10/O=USEPA/C=US

Sent: Mon 11/19/2012 11:30:44 PM

Subject: Re: Your Input & Review on Revised Draft NOAA/EPA CZARA Assessment

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I'm comfortable with where the letter is headed and appreciate you all taking the lead (thanks Jayne, Jenny, Don and Allison). We'll need to walk the fine line between "there is not enough info to tell" whether its approvable and "based on the specific info we've rec'd and lack of progress on key issues to date it's unlikely".

I will add more specifics to the forestry piece by cob this Wed.

I had a discussion with Josh Seeds, the forestry lead for DEQ today and we are meeting tomorrow to follow-up on the forest roads approach (more detail and timing for nailing commitments), where DEQ is on riparian protection (including Type N's), and what is being proposed for landslide prone areas (process, specific measures, scope beyond sediment listed streams). Josh will also be candid with me on areas where some nudging would be helpful.

p.s. I notice "road density" mentioned in the latest version of the letter...Jayne or Allison, do you remember whether that was in DEQ's proposal and our latest CNPCP letters to make sure that is an issue we still want to raise. It seems like we've focused on legacy roads in the last several rounds of correspondence...but I do remember cumulative effects and road density in earlier letters before I was too involved. I don't remember EPA discussions on forest roads with DEQ over the past several years on road density issues.

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-----Allison Castellan - NOAA Federal <allison.castellan@noaa.gov> wrote: -----

To: Jennifer Wu/R10/USEPA/US@EPA

From: Allison Castellan - NOAA Federal <allison.castellan@noaa.gov>

Date: 11/19/2012 08:10AM

Cc: Jayne Carlin/R10/USEPA/US@EPA, Alan Henning/R10/USEPA/US@EPA, David Croxton/R10/USEPA/US@EPA, David Powers/R10/USEPA/US@EPA, Don Waye/DC/USEPA/US@EPA, Helen Rueda/R10/USEPA/US@EPA, Kelly Gable/R3/USEPA/US@EPA

Subject: Re: Your Input & Review on Revised Draft NOAA/EPA CZARA Assessment

Jenny--

Thanks for your edits. I reviewed the letter again and made additional revisions to fix typos and moved some of more detailed info Jenny included in the cover letter to the enclosure. To the extent that we can, I think we should provide additional specifics on (and our opinions on if we think the approach is good enough or not), for the items Jenny listed in the enclosed document. Do we also want to include something about pesticides and that the court-ordered injunction we had relied on in our interim decision doc will expire in 2013 so that may be still be a gap in OR's program?

My updated version is attached (saved as today's date). I hope EPA R10 folks can continue to flesh out the enclosed document as quickly as possible. I'm getting a little worried that its almost Dec and we still don't have a complete draft and the letter still needs to go through legal review and get cleared by all three agencies.

Happy Thanksgiving everyone!
Allison

On Sun, Nov 18, 2012 at 10:08 AM, <Wu.Jennifer@epamail.epa.gov> wrote:

Hi Everyone, I've added and deleted some general language related to the Mid-Coast TMDL in the letter, so please check to see if you're okay with it. Essentially, I elaborated generally on the progress of DEQ on sediment and temp with the key message that it's critical they start identifying management measures with stakeholders now that the groundwork has been laid and because they are behind their deadlines.

If we want to get more specific, here are some areas that we could elaborate on:

- 1) geographic scope of the temperature and sediment TMDL (Are we okay with the sediment TMDL geographic scope esp. re: Type N streams?)
- 2) sediment water quality targets for 303(d) listings for biocriteria and turbidity (this was actually a difficult and crucial step of the TMDL to set a numeric target for a narrative standard)
- 3) approach that ODEQ is taking to evaluate ag and forestry practices first to assess progress to meeting water quality targets, then requiring additional management measures if necessary, to meet WQS.

4) Road inventory work on both forestry and ag lands

Here are specific issues that I didn't mention that we might consider for the letter:

- 1) Type N streams (would like to get clarification on this from Dave P and Allison re: sediment TMDL scope)
- 2) lack of work on landslide-prone areas
- 3) impacts from temperature ruling and ability to do temperature TMDL for Mid-Coast TMDL
- 4) reiterate importance of enforceability/accountability for actions on the ground and monitoring progress for meeting WQS

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-----Jayne Carlin/R10/USEPA/US wrote: -----

To: Alan Henning/R10/USEPA/US@EPA, David Powers/R10/USEPA/US@EPA, Helen Rueda/R10/USEPA/US@EPA, Jennifer Wu/R10/USEPA/US@EPA
From: Jayne Carlin/R10/USEPA/US
Date: 11/14/2012 03:51PM
Cc: Kelly Gable/R3/USEPA/US@EPA, Allison Castellan <allison.castellan@noaa.gov>, Don Waye/DC/USEPA/US@EPA, David Croxton/R10/USEPA/US@EPA
Subject: Your Input & Review on Revised Draft NOAA/EPA CZARA Assessment

Hi All,

I have added my minor comments to Allison's revised version, along with the list of documents, which are attached.

(See attached file: EPA NOAA Assessment Dec 2012 Draft 11-8-12_ac,dw,jc.docx)

(See attached file: List of Documents for EPA & NOAA Initial Assessment.docx)

Now it is your turn...

In particular, think about the key messages we need to get across, as well as the tone and of course, review for accuracy.

Thanks, Allison, for your thoughtful revisions.

Cheers,

Jayne

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Don Waye---11/14/2012 01:35:25 PM---Jayne, I agree with Allison's approach, and I also thank you for kicking this off in the right direc

From: Don Wayne/DC/USEPA/US
 To: Jayne Carlin/R10/USEPA/US@EPA,
 Cc: Alan Henning/R10/USEPA/US@EPA, David Croxton/R10/USEPA/US@EPA, David Powers/R10/USEPA/US@EPA, Helen Rueda/R10/USEPA/US@EPA, Jennifer Wu/R10/USEPA/US@EPA, Kelly Gable/R3/USEPA/US@EPA, Allison Castellan <allison.castellan@noaa.gov>
 Date: 11/14/2012 01:35 PM
 Subject: Re: Your Input & Review by COB Tuesday: Initial Draft NOAA/EPA CZARA Assessment

Jayne,

I agree with Allison's approach, and I also thank you for kicking this off in the right direction. I think we are saying the right things in terms of tone and message, and I agree with Allison that we look for Region 10 to supply the missing detail around the Additional MMs for Forestry. My comments are fairly modest, and are attached to Allison clean version of her edits.

[attachment "EPA NOAA Assessment Dec 2012 Draft 11-8-12_ac,dw.docx" deleted by Jayne Carlin/R10/USEPA/US]

Don Wayne

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Allison Castellan ---11/13/2012 04:13:41 PM---Jayne, Thanks again for taking the first attempt to capture our thoughts for the

From: Allison Castellan <allison.castellan@noaa.gov>
 To: Jayne Carlin/R10/USEPA/US@EPA
 Cc: Jennifer Wu/R10/USEPA/US@EPA, Alan Henning/R10/USEPA/US@EPA, Don Wayne/DC/USEPA/US@EPA, David Powers/R10/USEPA/US@EPA, Helen Rueda/R10/USEPA/US@EPA, David Croxton/R10/USEPA/US@EPA, Kelly Gable/R3/USEPA/US@EPA
 Date: 11/13/2012 04:13 PM
 Subject: Re: Your Input & Review by COB Tuesday: Initial Draft NOAA/EPA CZARA Assessment

Jayne,

Thanks again for taking the first attempt to capture our thoughts for the letter. The initial take is always the hardest and once something is down on paper, it becomes easier to see how we may want to present things. Per my earlier general comments, I've made an attempt to recraft the letter into a shorter cover letter and accompanying enclosure that provides the state specific feedback on their progress in meeting the MMs and whether or not the IR-TMDL approach will enable them to achieve/maintain WQS.

I've fleshed out the sections for new devel and OSDS but ran out of time for the other two sections related specifically to the settlement agreement. However, I wanted to go ahead and send along what I had so people can get a better sense of what I was thinking and see if this approach would work. It's still rough around the edges. Also, I'm hoping EPA R10 folks could take a first attempt at putting some specific feedback down related to the IR-TMDL approach/WQS question and ability to meet the additional MM for forestry condition since you're much more involved in that process than me. I may have some additional time to think more about those sections tomorrow but my schedule is pretty full and like I said, wanted to get something out to folks so you knew what I was working on.

I included the original letter with my comments so you understand some of the changes I made as well as a clean version since

track changes got rather messy.

Would be interested in your thoughts.

Allison

On Thu, Nov 8, 2012 at 1:03 PM, <Carlin.Jayne@epamail.epa.gov> wrote:

Hi All,

Attached is the initial draft assessment desperately needing your input and review.

(See attached file: EPA NOAA Assessment Dec 2012 Draft 11-8-12.docx)

Please provide your comments by COB on Tuesday and I will send out a revised draft for your review. I anticipate several rounds of comments before we can begin managerial and attorney review.

Jayne

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[attachment "EPA NOAA Assessment Dec 2012 Draft 11-8-12_ac.docx" deleted by Don Waye/DC/USEPA/US] [attachment "EPA NOAA Assessment Dec 2012 Draft 11-8-12_ac_clean.docx" deleted by Don Waye/DC/USEPA/US]

[attachment "List of Documents for EPA & NOAA Initial Assessment.docx" removed by Jennifer Wu/R10/USEPA/US]
[attachment "EPA NOAA Assessment Dec 2012 Draft 11-8-12_ac,dw,jc.docx" removed by Jennifer Wu/R10/USEPA/US]

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